217/785-1705

CONSTRUCTION PERMIT

PERMITTEE

Continental Tire the Americas, LLC
Attn: Larry Miles
11525 North Illinois Highway 142
Mount Vernon, Illinois 62864

Application No.: 12070023 I.D. No.: 081803AAB
Applicant's Designation: Date Received: July 12, 2012
Subject: Mixing Department Modification
Date Issued: DRAFT 10/11/2012
Location: 11525 North Illinois Highway 142, Mount Vernon

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of changes to the mixing department to facilitate new rubber compound technologies, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

If you have any questions on this permit, please contact Jason Schnepp at 217/524-3724.

Edwin C. Bakowski, P.E. Date Signed: _____
Manager, Permit Section
Division of Air Pollution Control

ECB:JMS:psj

cc: Region 3
CES

1.0 GENERAL CONDITIONS

1.1 Description

a. Continental Tire the Americas, LLC has applied for a construction permit for changes to the mixing department at its tire manufacturing plant in Mount Vernon. This project includes two new rubber mixing units, increased capacity of an existing mixing unit, and new carbon black day bins. The changes would accommodate demand for tires made with improved rubber compounds, which require additional mixing time. To maintain the production with the new rubber technology, additional mixing capacity is needed.

b. This project does not authorize an increase in rubber or tire production.

1.2 Applicable Provisions and Emission Standards

1.2.1 The affected units are subject to particular emission standards as set forth in Section 2 (Unit-Specific Conditions for Specific Emission Units) of this permit.

1.2.2 In addition, except as otherwise specified, emission units at this plant are subject to the following regulations of general applicability:

a. Pursuant to 35 IAC 212.301 and 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour).

b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

1.3 Non-Applicability Provisions

This permit is issued based on this project not being a major modification for purposes of 40 CFR 52.21, Prevention of Significant Deterioration (PSD) because it will not be accompanied by significant increases in emissions of NSR pollutants. (See Attachment 1.)

1.4 Control Requirements and Work Practice Requirements

The Permittee shall, to the extent practicable, maintain and operate the affected units, including associated air pollution control

equipment, in a manner consistent with good air pollution control practice for minimizing emissions.

1.5 Annual Limits

Unless otherwise specified in an applicable provision, compliance with the annual limits shall be determined from a running total of 12 months of data.

1.6 General Recordkeeping Requirements

1.6.1 Records for Opacity Observations

The Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9 for affected units that it conducts or that are conducted at its behest by individuals who are qualified to make such observations. For each occasion on which such measurements are made, these records shall include the identity of the observer, a description of the measurements that were made, the operating condition of the affected units, the observed opacity, and copies of the raw data sheets for the measurements.

1.6.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

1.7 Reporting Requirements

1.7.1 Reporting and Notifications Associated with Emissions Tests

a. The Illinois EPA shall be notified prior to emissions tests required by this permit to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA

will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.

b. At least 60 days prior to the actual date of required emissions testing, a written test plan shall be submitted to the Illinois EPA for review. This plan shall describe the specific procedures for testing, including as a minimum:

   i. The person(s) who will be performing sampling and analysis and their experience with similar tests.

   ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.

   iii. The specific determinations of emissions and operation, which are intended to be made, including sampling and monitoring locations.

   iv. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods.

   v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.

c. Copies of the Final Reports(s) for required emissions tests shall be submitted to the Illinois EPA within 30 days after the test results are compiled and finalized. The Final Report shall include as a minimum:

   i. A summary of results.

   ii. General information.

   iii. Description of test method(s), including description of sample points sampling train, analysis equipment, and test schedule.

   iv. Detailed description of test conditions, including:

      A. Process information.

      B. Control equipment information, e.g., equipment condition and operating parameters during testing.

   v. Data and calculations, including copies of all raw data sheets, opacity observation records and records

of laboratory analyses, sample calculations, and data on equipment calibration.

1.7.2 Reporting of Deviations

Except as specified in a particular provision of this permit or in a subsequent CAAPP Permit for the plant, reports for deviation from applicable requirements of this permit shall include at least the following information: the date and time of the event, a description of the event, information on the magnitude of the deviation, a discussion of the probable cause of the deviation, a description of the corrective measures taken, and a description of any preventative measures taken to prevent future occurrences.

1.8 Addresses

One copy of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

and one copy of reports and notifications concerning emission testing or continuous monitoring systems shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Source Monitoring Unit
9511 West Harrison
Des Plaines, Illinois 60016

1.9 Authorization to Operate

The Permittee is allowed to operate the modified Mixing Department under this Construction Permit until its CAAPP Permit is reissued or revised to address this project provided that the Permittee completes the following. This condition supersedes Standard Condition 6. (See Attachment 2.)

a. The Permittee has completed initial testing of control equipment for emissions of VOM in accordance with Conditions 1.6.1 and 2.2.7; and

b. The Permittee applies for a renewed or revised CAAPP permit within one year of initial startup of new and modified emission units pursuant to this project, as provided by Section 39.5(5) of the Environmental Protection Act.

2.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

2.1 Carbon Black Handling Operations

2.1.1 Description

The project will include installation of new carbon black day storage bins, which will be used to supply carbon black to the mixing equipment.

Carbon black, a raw material in the tire making process, is delivered to the facility by truck or railcar. Once unloaded, the carbon black is transferred to a silo for storage prior to use. When called for by the process, carbon black is pneumatically transferred from the silo to a day bin in the rubber mixing department. The handling of carbon black is a source of particulate matter. All carbon black handling operations are controlled by filters.

2.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Control Equipment
Day Bins #13-#24	Additional storage of carbon black in the mixing department	Baghouse

2.1.3 Applicable Provisions and Emission Standards

a. An "affected unit" is a carbon black handling operation described in Conditions 2.1.1 and 2.1.2.

b. The affected units are subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c).

2.1.4 Work Practice Requirements

The affected units shall be controlled by filters at all times the affected units are in operation.

2.1.5 Emission Limits

This permit is issued based on minimal emissions of particulate matter ($PM/PM_{10}/PM_{2.5}$) from the affected units, in total. For this purpose, emissions from the affected units combined shall not exceed 0.25 lb/hour and 1.1 tons/year.

2.1.6 Testing Requirements

a. i. Upon request of the Illinois EPA, the Permittee shall have the PM emissions from affected unit(s) measured at the Permittee's expense by an approved testing service using standard USEPA Test Methods.

ii. For this testing, the Permittee shall submit reports and notifications in accordance with Condition 1.7.1.

b. Upon request of the Illinois EPA, the Permittee shall have the opacity from the affected unit(s) measured at the Permittee's expense by a certified observer using USEPA Method 9.

2.1.7 Inspection Requirements

a. The Permittee shall measure and record the pressure drop across each baghouse on at least a daily basis.

b. The Permittee shall perform detailed inspections of the dust collection equipment for the affected units at least every 15 months while the units are out of service, with an initial inspection performed before any maintenance and repair activities are conducted during the period the unit is out of service and a follow-up inspection performed after any such activities are completed.

2.1.8 Recordkeeping Requirements

a. The Permittee shall maintain an operating log for the affected units that, at a minimum, includes identification of each period when an affected unit or the associated control device operated in an atypical manner as related to generation of PM emissions.

b. The Permittee shall keep an inspection and maintenance log for each baghouse and the bin vent filter. At a minimum, these logs shall show the date and nature of inspection, preventative maintenance and repair of the baghouses or bin vent filter.

c. The Permittee shall maintain an inspection and maintenance log or other records for each affected unit and associated emission control devices that, at a minimum, document performance of the inspections and results of inspections required by Conditions 2.1.8(a) and (b) and other activities performed to maintain proper operation as related to control of emissions.

2.1.9 Reporting Requirements

If there is any deviation from the requirements of this permit involving affected units, as determined by the records required by this permit or by other means, the Permittee shall report to

the Illinois EPA as specified below until such time the affected units are addressed by an operating permit. The report shall include the information requested in Condition 1.7.2.

a. Deviations from the work practice requirements and emission limits in Conditions 2.1.4 and 2.1.5 shall be reported within 30 days of such occurrence.

b. Other deviations shall be reported in a semi-annual report.

2.2 Mixing Operations

2.2.1 Description

This project will include construction of two new mixers and associated twin screw roller dies (Mixers #20 and #21) and modification of one existing mixer (Mixer #5) by increasing its capacity and replacing the existing drop mill with a twin screw roller die. Particulate matter from these mixers will be controlled by existing baghouses. VOM emissions from mixing and milling will be controlled by existing regenerative thermal oxidizers (RTOs).

VOM emissions will occur during the mixing process as certain raw materials volatilize. These emissions will be controlled by natural gas fired afterburners. Handling of raw materials will cause PM emissions, which will be controlled by filters. VOM emissions will also occur during the milling operation, which involves the new twin screw roller dies, as the raw materials in the mixed rubber continue to volatilize, and will be controlled by natural gas fired afterburners.

2.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Control Equipment
Mixer #20	New mixer with twin screw roller die.	Baghouse and RTO
Mixer #21	New mixer with twin screw roller die.	Baghouse and RTO
Mixer #5	Modified mixer with increased capacity and new twin screw roller die.	Baghouse and RTO

2.2.3 Applicable Provisions and Emission Standards

a. For the purpose of these unit-specific conditions, affected units are the mixers including associated roller dies described in Conditions 2.2.1 and 2.2.2.

b. The affected units are subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c).

c. The affected units are subject to 35 IAC 215.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from each affected unit. If no odor

nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.

2.2.4 Non-Applicability Provisions

a. This permit is issued based on the affected units being rubber processing operations that are not subject to any emission limitations or other requirements under the NESHAP, 40 CFR Part 63 Subpart XXXX, pursuant to 40 CFR 63.5982(b)(4).

b. This permit is issued based on the affected units not being subject to the control requirements of the NSPS, 40 CFR Part 60 Subpart BBB, because the affected units are not cementing or spraying operations addressed by the requirements of the NSPS, 40 CFR 60.540.

2.2.5 Work Practice and Control Requirements

a. The capture and control systems for the affected units shall be operated at all times the affected units are in operation.

b. Each RTO controlling the affected units shall be capable of achieving a minimum VOM destruction efficiency of 99 percent or an outlet VOM concentration of no more than 4.9 ppmv (as propane) for Mixers #20 and #21 and no more than 2.0 ppmv (as propane) for Mixer #5.

c. i. Upon completion of start-up and achievement of normal operation of the affected mixers assigned to the RTOs, the control system combustion chambers shall be preheated to the temperature at which compliance was demonstrated in the most recent emissions test or 1600°F in the absence of an emissions test, before the affected units begin operation, and this temperature shall be maintained during operation of the affected units.

ii. Notwithstanding the above, the control system combustion chambers may be operated at a lower temperature for purposes of additional emissions testing.

2.2.6 Operational and Emission Limits

a. The production rate for Mixers 20 and 21 shall not exceed 84,150,000 pounds of rubber per year and 75,900,000 pounds of rubber per year, respectively.

b. i. A. Hourly VOM emissions from affected units #20 and #21 shall not exceed 4.68 lb/hour (hourly

average) and 4.22 lb/hour (hourly average), respectively.

B. The annual VOM emissions of affected units #20 and #21 shall not exceed the applicable limit in Attachment 1.

ii. This permit is issued based on negligible emissions of $PM/PM_{10}/PM_{2.5}$ from the affected units. For this purpose, emissions from all affected units combined shall not exceed 0.44 tons/year.

2.2.7 Testing Requirements

a. i. A. Within 180 days of initial startup of affected units #20 and #21, the Permittee shall have an emissions test performed on the RTO that controls affected units #20 and #21. This test shall be performed during operating conditions that are representative of maximum emissions, i.e., while affected units #20 and #20 are in operation and processing the maximum amount of material. This test shall be designed to determine the emission rate in terms of lb VOM/hour and lb VOM/lb rubber processed, and the destruction efficiency of the RTO.

B. Within 180 days of initial startup of affected unit #5, the Permittee shall have an emissions test performed on the RTO that controls affected unit #5. This test shall be performed during operating conditions that are representative of maximum emissions, i.e., while affected unit #5 is in operation and processing the maximum amount of material. This test shall be designed to determine the emission rate in terms of lb VOM/hour and lb VOM/lb rubber processed and the destruction efficiency of the RTO.

ii. If the criteria for total enclosure are not met, this test shall also be designed to determine the capture efficiency of the capture system for units venting to each RTO.

iii. The following methods and procedures shall be used for testing, unless use of another method developed or supported by USEPA is approved by the Illinois EPA as part of the approval of the test plan. Refer to 40 CFR Part 51, Appendix M and 40 CFR Part 60, Appendix A, for USEPA test methods.

Capture Efficiency	USEPA Method 204 of 40 CFR 51, Appendix M

Total Gaseous Organic Conc.	Method 25A, with ethanol used as the calibration gas

iv. For this testing, the Permittee shall submit reports and notifications in accordance with Condition 1.7.1.

b. Upon request of the Illinois EPA, the Permittee shall have the opacity from the affected unit(s) measured at the Permittee's expense by a certified observer using USEPA Method 9.

2.2.8 Inspection Requirements

a. The Permittee shall perform inspections of each affected unit, including associated control measures, on at least a monthly basis to confirm proper operation as related to control of emissions.

b. The Permittee shall perform detailed inspections of the dust collection equipment for the affected mixers at least every 15 months while the units are out of service, with an initial inspection performed before any maintenance and repair activities are conducted during the period the unit is out of service and a follow-up inspection performed after any such activities are completed.

2.2.9 Monitoring Requirements

a. The Permittee shall use continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the RTOs are in use. The continuous monitoring equipment shall monitor the combustion chamber temperatures of each RTO.

b. The Permittee shall calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or ± 0.5 degrees Celsius, whichever is greater.

2.2.10 Recordkeeping Requirements

a. The Permittee shall maintain the following operating records:

i. Total throughput of rubber for each affected unit (tons/month and tons/year).

ii. Usage of organo-silane coupling agents for each affected mixer, by type (tons/month and tons/year).

b. Permittee shall maintain an operating log for the affected units that, at a minimum, includes:

i. Information for any significant changes in the compounding process, the type of silane coupler used, or the curing process that may affect the evolution of VOM, with description.

ii. Identifies each period when an affected unit or the associated control device operated in an atypical manner as related to generation of VOM or PM emissions.

c. The Permittee shall maintain the following records for emissions from the affected units:

i. A file containing the emission factors used to calculate the VOM emissions from the affected units and the maximum hourly VOM emission rates during normal operation of the units, with supporting documentation and calculations, which file shall be kept current.

ii. The emissions of VOM for the affected units (tons/month and tons/year), with supporting calculations.

d. Recordkeeping For Affected Unit #5: The Permittee shall keep the following records.

i. Before beginning actual construction of the project, the Permittee shall document and maintain a record of the following information: [40 CFR 52.21(r)(6)(i)]

A. A description of the project;

B. Identification of the emissions unit(s) whose emissions could be affected by the project; and

C. A description of the applicability test used to determine that the project is not a major modification, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded under 40 CFR 52.21(b)(41)(ii)(c) and an explanation for why such amount was excluded, and any netting calculations, if applicable.

ii. The Permittee shall keep records for the emissions of VOM and PM that are emitted by any emissions unit identified in 40 CFR 52.21(r)(6)(i)(b) (See also Condition 2.2.10(d)(i)(B)) and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years

following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations after the change if the project increases the design capacity or potential to emit for VOM or PM at such emissions unit. [40 CFR 52.21(r)(6)(iii)]

e. The Permittee shall maintain an inspection and maintenance log or other records for each affected mixer and associated emission control devices that, at a minimum, document performance of the inspections and results of inspections required by Conditions 2.2.8(a) and (b) and other activities performed to maintain proper operation as related to control of emissions.

f. The Permittee shall collect and record all of the following information each day for each RTO and maintain the information at the facility for a period of three years:

i. Control device monitoring data.

ii. A log of operating time for the capture system, control device, monitoring equipment and the associated affected units.

iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

g. The Permittee shall maintain a file that contains documentation of the burner capacity for each RTO and the potential emissions of GHG (as CO_2e), NO_x, CO and VOM for each RTO.

2.2.11 Reporting Requirements

a. If there is any deviation from the requirements of this permit involving affected units, as determined by the records required by this permit or by other means, the Permittee shall report to the Illinois EPA as specified below until such time the affected units are addressed by an operating permit. The report shall include the information specified in Condition 1.7.2.

i. Deviations from the emission limits in Condition 2.2.6 shall be reported within 30 days of such occurrence.

ii. Other deviations shall be reported in a semi-annual report.

b. Reporting For Affected Unit #5

The Permittee shall submit a report to the Illinois EPA and USEPA if the annual VOM and PM emissions, in tons per year, from the project, exceed the baseline actual emissions (as documented and maintained pursuant to 40 CFR 52.21(r)(6)(i)(c), by a significant amount (as defined in 40 CFR 52.21(b)(23)), and if such emissions differ from the preconstruction projection as documented and maintained pursuant to 40 CFR 52.21(r)(6)(i)(c). Such report shall be submitted to the Illinois EPA and USEPA within 60 days after the end of such year. The report shall contain the following information: [40 CFR 52.21(r)(6)(v)]

i. The name, address and telephone number of the source;

ii. The annual emissions as calculated pursuant to 40 CFR 52.21(r)(6)(iii); and

iii. Any other information that the Permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

3.0 ATTACHMENTS

Attachment 1: Annual Emission Limits and Increases[a] In Emissions For the Project (Tons/Year)

	NO_x		CO		VOM[b]		PM[c]		GHG (as CO_2e)	
Affected Units	Limit	Increase	Limit	Increase	Limit	Increase	Limit	Increase	Limit	Increase
Carbon Black Handling Operations										
New Day Bin #13-#24	---	---	---	---	---	---	1.10	1.10	---	---
Mixing and Dies										
New Mixer #20 w/Die & RTO 1	5.44	5.44	4.57	4.57	61.02	35.59	0.44	0.44	6,500	6,500
New Mixer #21 w/Die & RTO 1										
Mixer #19 w/mill & RTO 1										
Tread End Cementing & RTO 1										
Modified Mixer #5 w/Die & RTO 2	0.99	0.99	0.83	0.83	n/a	---	n/a	0.02	1,200	1,200
Mixer #6 w/mill & RTO 2										
Total:		6.43		5.40		35.59		1.56		7,700
Significance Threshold:		40		100		40		25/15/10		75,000
Greater Than Significant?		No		No		No		No		No

Notes:

--- Minimal or no increase.

a. Increases in emissions from new units are equal to the unit's potential to emit or permitted emissions (or "limit"). Increases in emissions at existing units are calculated by comparing projected actual emissions with baseline actual emissions as those terms are defined in 40 CFR 52.21(b). Baseline actual emissions are from the period January 2007 through December 2008. Emissions of SO_2 from this project will be negligible, i.e., less than 0.44 tons/year.

b. VOM emissions attributable to fuel combustion in the RTOs has also been included in the VOM limit/increase. See Attachment 2a and 2b for details regarding VOM increases.

c. All PM assumed to be PM_{10} and $PM_{2.5}$. The significant emission rates for PM, PM_{10}, and $PM_{2.5}$ are 25 tons, 15 tons, and 10 tons per year, respectively. PM includes both filterable and condensable particulate.

Attachment 2a: Change in VOM Emissions for Units Controlled by RTO 1 (Tons/Year)

Unit	BAE[a]	PAE[b]	Change[c]
New Mixer #20 w/Die & RTO 1	0	18.61	18.61
New Mixer #21 w/Die & RTO 1	0	16.79	16.79
Additional Burners for RTO 1	0	0.19	0.19
Mixer #19 w/mill & RTO 1[d]	25.27	25.27	0
Tread End Cementing & RTO 1[d]			
	Total	61.02	35.59

Notes:
a. BAE means Baseline Actual Emissions as defined in 40 CFR 52.21(b)(48).
b. PAE means Projected Actual Emissions as defined in 40 CFR 52.21(b)(41).
c. The change in emissions is calculated by comparing the BAE with the PAE.
d. These units are grouped with new units from this project because they vent to a common RTO. Mixer #19 with mill and Tread End Cementing are treated as "new emission units" because they have existed for less than 2 years (See also 40 CFR 52.21(b)(7)(i)). For purposes of calculating the change in emissions at these units for this project, the units' PAE (25.27 tons/year as limited by Construction Permit No. 11010008) are compared with the units' BAE (25.27 tons/year, see 40 CFR 52.21(b)(48)(e)(iii)). Accordingly, the change in emissions is zero.

Attachment 2b: Change in VOM Emissions for Units Controlled by RTO 2 (Tons/Year)

Unit	BAE[a]	PAE[b]	Change[c]
Modified Mixer #5 w/Die & RTO 2	3.21	2.74	-0.47
Mixer #6 w/mill & RTO 2[d]	5.61	5.61	0
		Total	-0.47

Notes:
a. BAE means Baseline Actual Emissions as defined in 40 CFR 52.21(b)(48).
b. PAE means Projected Actual Emissions as defined in 40 CFR 52.21(b)(41).
c. The change in emissions is calculated by comparing the BAE with the PAE.

Attachment 2: Standard Permit Conditions

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits, which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.

2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.

3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Illinois EPA and a supplemental written permit issued.

4. The Permittee shall allow any duly authorized agent of the Illinois EPA upon the presentation of credentials, at reasonable times:

    a. To enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

    b. To have access to and to copy any records required to be kept under the terms and conditions of this permit,

    c. To inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

    d. To obtain and remove samples of any discharge or emissions of pollutants, and

    e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:

   a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,

   b. Does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities.

   c. Does not release the Permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations.

   d. Does not take into consideration or attest to the structural stability of any units or parts of the project, and

   e. In no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Illinois EPA before the equipment covered by this permit is placed into operation.

 b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.

7. The Illinois EPA may file a complaint with the Board for modification, suspension or revocation of a permit.

   a. Upon discovery that the permit application contained misrepresentations, misinformation or false statement or that all relevant facts were not disclosed, or

   b. Upon finding that any standard or special conditions have been violated, or

   c. Upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

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